

**From:** Rand Crafts  
**To:** Jerry Hintze  
**Date:** Wednesday, February 21, 2001 9:01:42 AM  
**Subject:** Observation & Comments - HP\_Dense Pack

HP\_Dense Pack Project Permitting Issues  
Please incorporate as best as you can.

Options 1 & 2: The environmental assessment is correct in that they SHOULD not trigger permitting issues. But, under comments, we not only assume no increases, there can NOT be ANY increases. If emissions increase more than 40 tons, we must then prove that the increases were not caused by the modifications, which is difficult to do. We would strongly recommend not relying on this. It would be better to proceed with Option 4. Otherwise, if we must do only the dense pack portion, then we should still discuss permitting with the State. So you need to at least provide a caveat in your discussion.

Option 3: The synthetic minor permit now looks like it will be difficult to obtain. Although the State rules allow it, and the State has done it for other major sources, they are unlikely to allow the use of synthetic minor permitting in this case. We are doubtful that given the current attitude, that this Option is viable.

Option 4: Another "moderate" NOx control that looks applicable is the use of new generation LNBs. Even a moderate (10%) decrease in NOx can get us permitted. It may be worthwhile to look at this in these scenarios, with an economic analysis. Also, under the environmental assessment column, we don't consider it a "strong" possibility that BACT will be triggered for us in 2008. Although it may be likely that either Congress or a new administration may force the issue by then. It's not a planning element at this time.

**CC:** Blaine Ipson